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May 17, 2023

**VIA ECF**

Hon. Joan M. Azrack, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Agudelo v. Recovco Mortgage Management LLC, et al.*  
E.D.N.Y. Case No. 22-cv-04004

Dear Judge Azrack:

As directed by the Court in its Order dated May 10, 2023, we are writing as counsel for Defendants and on behalf of all parties to advise the Court on the status of Defendants' efforts to fund the settlement in principle that the parties have reached in this action. Defendants are working diligently to liquidate certain assets necessary to fund the settlement. Based on the information currently available, Defendants expect to fund the initial payment of \$1,950,000 by June 5, 2023. Defendants further expect to be able to fund the remainder of the settlement on the schedule initially agreed to among the parties in their Memorandum of Understanding. On that basis the parties request that the date for submission of the motion for preliminary approval and the related pleadings be extended to May 25, 2023. We thank the Court for its attention to this matter.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ *Marc S. Wenger*

Marc S. Wenger

MSW:dc

cc: All Counsel of Record